

EXHIBIT G

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2
3 UNITED STATES BANKRUPTCY COURT
4 WESTERN DISTRICT OF WASHINGTON - TACOMA
5

6 SARAH HOOVER,
7 Debtor,
8

BK No. 19-42890- MJH

Adv No. 20-04002 – MJH

Chapter 7

9 SARAH HOOVER,
10 Plaintiff,
11 v.

QUALITY LOAN SERVICE
CORP. OF WASHINGTON'S
RESPONSE TO PLAINTIFF'S
FIRST SET OF
INTERROGATORIES AND
REQUESTS FOR PRODUCTION

12 QUALITY LOAN SERVICE
13 CORPORATION OF
14 WASHINGTON, PHH
15 MORTGAGE CORPORATION
16 DBA PHH MORTGAGE
17 SERVICES, HSBC BANK USA,
18 N.A. AS TRUSTEE OF THE
19 FIELDSTONE MORTGAGE
INVESTMENT TRUST, SERIES
2006-2, NEWREZ, LLC, IH6
PROPERTY WASHINGTON, LP,
DBA INVITATION HOMES.

Defendants.

20 **INTRODUCTION**

21 Defendant QUALITY LOAN SERVICE CORPORATION OF
22 WASHINGTON, a Washington Corporation ("Quality" or "Responding Party")
23

1 RESPONSE: Responding Defendant incorporates its answer and objections
2 contained in its Request for Production No. 1. As stated in Responding
3 Defendant's response to Interrogatory No. 11, Ocwen's foreclosure counsel
4 McCarthy & Holthus, LLP provided research and notice of any potential heirs to
5 Quality which included the social security number [REDACTED]-8882 for Sarah Hoover,
6 listed as a potential daughter. Responding Defendant directs Plaintiff to Bates
7 stamped numbers QWA002219 – QWA002225.

8 REQUEST FOR PRODUCTION NO. 7: Produce all Documents QLS
9 received from NewRez, regarding Sarah Hoover.

10 RESPONSE: Responding Defendant incorporates its answer and objections
11 contained in its Request for Production No. 4. NewRez would have only produced
12 documents to Quality through either Ocwen or PHH. It is the position and
13 understanding of Quality that NewRez did not produce documents directly to
14 Quality.

15 REQUEST FOR PRODUCTION NO. 8: Produce all Documents QLS
16 received from HSBC, regarding Sarah Hoover.

17 RESPONSE: Responding Defendant incorporates its answer and objections
18 contained in its Request for Production No. 5. HSBC would have only produced
19 documents to Quality through either Ocwen or PHH. It is the position and
20 understanding of Quality that HSBC did not produce documents directly to
21 Quality.

22 REQUEST FOR PRODUCTION NO. 9: Produce all Documents QLS
23 sent to PHH, regarding the Account and Property at issue in this Lawsuit.

24 RESPONSE: Responding Defendant objects to this request (1) on the
25 grounds that as worded this request is overly broad, vague, and ambiguous; (2) to
the extent that it is not reasonably limited in scope by time or subject matter (and

1 as a result is overly broad and unduly burdensome); (3) to the extent that it seeks
2 confidential, irrelevant, and proprietary materials. Subject to and without waiving
3 any of the foregoing objections, Responding Defendant answers as follows: To the
4 extent that this request for production relates to the nonjudicial foreclosure Quality
5 processed on the property commonly known as 18205 106th Street East Bonney
6 Lake, WA 98391 Quality agrees to produce all non-privileged documents
7 contained within its nonjudicial foreclosure files for this property. Responding
8 Defendant directs Plaintiffs to Bates stamped numbers QWA000001 –
9 QWA003162. Any documents contained within a client system other than the
10 Trustee's File such as Equator, LPS and/or NewTrak systems or a document held
11 by a party other than the Trustee are not materials within responding party's
12 possession, custody and control and as such the responding party has no documents
13 within its custody, possession, and control responsive to this Request for
14 Production other than those materials provided.

15 REQUEST FOR PRODUCTION NO. 10: Produce all Documents QLS
16 sent to NewRez, regarding the Account and Property at issue in this Lawsuit.

17 RESPONSE: Responding Defendant incorporates its answer and objections
18 contained in its Request for Production No. 9. Quality would have only produced
19 documents to NewRez through either Ocwen or PHH. It is the position and
20 understanding of Quality that Quality did not produce documents directly to
21 NewRez.

22 REQUEST FOR PRODUCTION NO. 11: Produce all Documents QLS
23 sent to HSBC, regarding the Account and Property at issue in this Lawsuit.

24 RESPONSE: Responding Defendant incorporates its answer and objections
25 contained in its Request for Production No. 9. Quality would have only produced
documents to HSBC through either Ocwen or PHH. It is the position and

1 electronic logs, emails, text messages, or other media) relating to or depicting
2 anything concerning the Account or Sarah Hoover, including your internal File.

3 RESPONSE: Responding Defendant incorporates its answer and objections
4 contained in its Request for Production No. 1.

5 **VERIFICATION**

6 The undersigned, say that I am an employee of defendant Quality Loan
7 Service Corporation of Washington and am duly authorized by said defendant to
8 execute the instant Verification. I have read the foregoing DEFENDANT
9 QUALITY LOAN SERVICE CORPORATION OF WASHINGTON'S
10 RESPONSE TO PLAINTIFF'S DISCOVERY TO QUALITY LOAN SERVICE
11 CORPORATION OF WASHINGTON and know the contents thereof; and that the
12 same is true of my own knowledge, except as to matters which are therein stated
13 upon its information or belief, and as to those matters that I believe them to be true.
14 I certify under penalty of perjury, under the laws of the State of Washington that
15 the foregoing is true and correct and that this verification was executed on June 8,
16 2020 at Seattle, Washington.

17 
18 Quality Loan Service Corporation of Washington

19 By: *Jeff Stenman*

20 Its: *President*

21 **ATTORNEY VERIFICATION**

22 The undersigned attorney for Defendant Quality Loan Service Corporation of
23 Washington, Inc. ("Quality") has read the foregoing Plaintiff's First Request To
24 Identify And Produce Documents And Answer Interrogatories To Defendant
25

1 Quality Loan Service Corporation of Washington, Inc. and Quality's Answers and
2 Responses Thereto and they are in compliance.

3 Dated this 9 day of June, 2020, at Seattle, Washington

4
5 By: 

6 Joseph W. McIntosh, WSBA #39470
7 Quality Loan Service Corporation of
8 Washington, Inc.
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